100 Mile House Timber Supply Area
Timber Supply Review

Summary of Public Input

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This is a summary of the public input received on the Timber Supply Review in the 100 Mile House Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

100 Mile House Timber Supply Area

Background

As part of the review of timber supply in the 100 Mile House Timber Supply Area (TSA), two opportunities were provided for public input. The first followed the release of the 100 Mile House Timber Supply Area *Data Package* and *Information Report* in May 1998. The *Information Report* was a non-technical summary of the draft data and management assumptions that were to be applied in reviewing the timber supply for the 100 Mile House TSA. A 30-day review period, ending June 1, 1998, was provided for the public to comment on these documents.

On July 5, 2001, the British Columbia Forest Service released the *2001 100 Mile House Timber Supply Area Analysis Report* and *Public Discussion Paper*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information during the 45-day review period that ended August 20, 2001.

This report summarizes the input received during both public review periods. This information was provided to the chief forester for his consideration when he reviewed the AAC for the 100 Mile House TSA. The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the 100 Mile House Forest District office.

Public Review Process and Response

100 Mile House District staff and Cariboo Regional staff actively solicited public input on the Timber Supply Review in the 100 Mile House TSA through the following actions:

- copies of the *Data Package, Information Report, Analysis Report* and *Public Discussion Paper* were mailed to stakeholders in the TSA, including First Nations, licensees, local governments and environmental groups. Meetings or presentations were offered.
- the *Data Package* and *Analysis Report* were available at both the district office in 100 Mile House and the Cariboo regional office in Williams Lake.
- newspaper advertisements were placed, advising of the availability of all documents for review by the public.

The 100 Mile House Forest District received one written submission on the *Data Package* and three submissions on the *Analysis Report* (see Appendix 1).

Public Input

In this section, public input on the information presented in the Timber Supply Review documents for the 100 Mile House TSA is summarized under the following headings:

- Data Package (and Information Report)
- Timber Supply Area Analysis Report
- Other comments

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100 Mile House Timber Supply Area

Data Package

Land Base Factors

The submission from the 100 Mile House TSR Licensees Working Group (the licensees) expresses opposition to excluding from the harvesting land base all areas with slopes exceeding 50 percent and recommends no reductions be made due to inoperability. The licensees express the opinion that potentially all of the TSA is operable and any minor exceptions will be excluded through visual or other constraints. The licensees also note that over the last 10 years, 200 to 300 hectares have been harvested using cable or helicopter systems on slopes over 50 percent.

The licensees also express concern about the reduction from the productive land base to account for roads, trails and landings (RTLs). They say a large proportion of the reduction is associated with temporary roads and landings that support significant healthy regeneration and that are not part of a licensee's free-to-grow commitment. The licensees also object to the removal of the full road width, saying trees along roads use growing space occupied by a portion of the road surface. The licensees provide data from an audit of regeneration ingress on historic RTLs, and recommend a deduction as per that report (2.5 to 3 percent).

The licensees say the assumption of no harvesting for 20 years in caribou areas is contrary to the Cariboo-Chilcotin Land-Use Plan Integration Report (CCLUP-IR). The report allows modified harvesting in 25 percent of the area over the first 20 years, as well as harvesting in 10 percent of the area for salvage purposes or using alternative harvesting systems. The licensees say these directions must be used in the timber supply analysis.

Volume Estimates for Regenerated Stands

The licensees express concern that the findings of the J.S. Thrower and Associates report on growth rates in regenerated stands will only be applied to the stands surveyed. The licensees recommend the results be applied to all age class 1 or 2 stands throughout the analysis period.

The licensees also express concern that no managed stand yield tables exist for selection management. They say that, based on observation, it's clear the use of natural stand yield tables significantly underestimates the productive capacity of these sites and they request a sensitivity analysis that demonstrates a more realistic level of productivity.

Regeneration and Silvicultural Factors

The licensees ask that the regeneration delay for deciduous-leading naturally-regenerated stands be reduced from seven to four years. They also suggest the level of planting on poor site pine stands be increased from 10 percent to 40 percent.

The licensees express disagreement with the *Data Package* assumption that all areas disturbed prior to 1967 are not eligible for density control and will be considered unmanaged stands. They note that 1349 hectares have been spaced in stands clearcut prior to 1967 and that many of the older fir stands harvested by selection methods have been spaced. The licensees also ask that post-spacing densities be reviewed, saying licensees' current practice is 3250 to 4250 stems per hectare.

Utilization Factors

The licensees say that with improvements in harvesting and manufacturing, licensees can utilize a smaller timber profile. They say stands should be available for harvest at a minimum diameter or at culmination age, whichever is earliest, rather than at a predetermined age. They recommend that, at a minimum, this approach be tested in one of the CCLUP management zones.

Unsalvaged Losses

The licensees express the opinion that a portion of the estimate of unsalvaged losses is accounted for in inventory sampling, as it results from natural processes in the forest. They also question the losses to blowdown applied to every block harvested, saying that one-third of the blocks are in the dry belt and selective logging

areas where there is no history of blowdown losses along cutblock boundaries.

Green-up Requirements

The licensees say the chief forester's direction on evaluation of stands for green-up will functionally reduce the height to achieve green-up. They say using yield curves to project green-up age is a crude tool, but some recognition of the reduced requirement should be made either in a sensitivity analysis or in the actual ages used in the analysis.

Mule Deer Winter Range

The licensees say the *Data Package* is essentially correct with regard to removal percentages and re-entry periods in mule deer winter range (MDWR) areas. However, they say it's unreasonable to assume that the only Douglas-fir-leading area available for harvesting in the first 50 years of the analysis period is the area currently identified as available. They note that the CCLUP-IR indicates that MDWR volumes will be accessed in the 20-year time period through various means.

Wildlife Tree Patches

The licensees make three comments with regard to wildlife tree patches (WTPs):

- in selection harvesting, large Douglas-fir stems are double-counted, as they are deducted for both wildlife tree and silvicultural basal area purposes. The area associated with these large stems should be added to the productive land base to eliminate this duplication.
- the CCLUP-IR directs that 50 percent of WTPs will be removed over a rotation and this should be incorporated in the analysis.
- the cumulative percentage for riparian and WTP reductions is about 18 percent, which violates the objective of the Forest Practices Code to not exceed six percent. The *Data Package* should include a statement supporting the Code's objective and a commitment to move to the six percent goal.

Landscape Level Biodiversity

The licensees do not agree that seral stage management as described in the *Data Package* can be considered as current management, noting that landscape level plans are only being developed. They say the approach to landscape biodiversity in the CCLUP-IR should be recognized.

Cariboo-Chilcotin Land-Use Plan

The licensees express the opinion that the land use plan has not been adequately addressed in the *Data Package*, noting the plan's implementation will have immediate and pronounced impacts on many of the elements addressed in the analysis, including biodiversity, mule deer and caribou. They maintain the CCLUP-IR must be treated as current management, given its adoption in April 1998 and its inclusion in direction letters to forest development plan proponents. The licensees say that because the IR indicates timber access targets have to be met, reductions to the land base should be considered in conjunction with these.

The licensees note that the IR analysis includes a test that compares long-term timber supply analysis results against the Short Term Timber Availability Assessment completed in 1996. They say the results indicate there is more than sufficient volume to meet the 20-year requirements, and this is critical information that should be highlighted in the *Data Package*.

Timber Supply Area Analysis Report

Land Base Factors

The submission from the association representing the major licensees questions the land base reductions for roads, trails and landings (RTLs). The association says a reconnaissance level survey done in 1999 showed a 0.5 to 1.0 percent increase in the harvest level as a result of RTL netdowns being reduced from Timber Supply Review assumptions. A survey acceptable to the Ministry of Forests will be carried out in 2002, according to this submission.

Volume Estimates for Existing Stands

The licensees' association says that although uncertainty exists about volume estimates for mature stands, the actual uncertainty remains unquantified. The association expresses concern that information in the *Analysis Report* (e.g., Figure 23) sends a message to the public and the chief forester that current harvest levels are not sustainable beyond one or two decades. The association believes this is unlikely since other analyses indicate many opportunities to enhance the current harvest. Two examples are provided:

- preliminary analysis from Vegetation Resource Inventory work in the Lignum Innovative Forest Practices Agreement area indicates that current volume estimates in the Interior Douglas-fir (IDF) Zone may be low.
- ongoing work on calibrating yield models in the IDF Zone is indicating a higher average annual growth than that used in the Timber Supply Review.

Volume Estimates for Regenerated Stands

The licensees' association refers to a 1998 report by J.S. Thrower & Associates that showed increased annual growth in regenerated stands. Although the report was provided to the Ministry of Forests, the association says it was not included in the base case analysis. An FRBC-funded initiative will be completed in 2001 and will identify approaches to incorporate the results of the Thrower report for timber supply planning, according to this submission.

Wildlife Tree Patches

The licensees' association says the netdown percentages for wildlife tree patches are exceedingly high compared to surrounding TSAs. Comparisons are provided.

Socio-Economic Factors

The David Suzuki Foundation says if the primary goal of harvesting is to provide employment and income, other ways to accomplish this besides increasing the AAC and losing other values of the forests must be considered. The foundation says clearcut industrial logging is not sustainable and a new approach may mean a lower AAC, but with a greater good and value distributed throughout the community.

Other Comments

Two submissions comment on factors or issues other than those specifically covered by Timber Supply Review documents. These comments are summarized in this section.

Management Practices and Approach

The David Suzuki Foundation says the resources of the Ministry of Forests' must be applied to managing our forests for all values equally, not maximizing timber volumes as the primary goal while squeezing in token gestures for other values such as wildlife, fish and biodiversity. The ministry should act as an intermediary between all interested parties, not as an advocate for timber interests, according to the foundation.

Harvest Levels

The David Suzuki Foundation says increasing the AAC will severely limit planning of both where and how to harvest. The foundation says the present AAC is too high and must be lowered to consider all values of the precious few remaining old-growth forests.

The licensees' association says the analysis is on balance a reasonable reflection of current forest management practices, but expresses concern that the analysis overemphasizes a possible downward pressure on the AAC attributable to the inventory audit. Specifically, the association says:

- other technical information is coming forward that contradicts some of the audit results.
- the analysis uses information that in some cases is conservative and with further quantification will exert an upward pressure on harvest levels.
- analyses by the licensees and the Timber Investment Strategy Committee have identified a number of opportunities to increase harvest levels.

100 Mile House Timber Supply Area

The association says the potential for cumulative upward pressures and opportunities should be reflected in the analysis and conveyed to the public and the chief forester. The submission provides examples of a higher AAC resulting from different assumptions for operability, wildlife tree patches, green-up ages, minimum harvest ages, RTLs, regeneration delay, use of genetically improved stock, fertilization and problem forest type rehabilitation.

Apportionment of PA 16

Ainsworth Lumber Company says they are participating in a working group with the regional managers of the Cariboo and Kamloops forest regions to clarify management issues for Pulpwood Agreement #16 (PA 16). The company says the issue of harvest apportionment for PA 16 should be considered in the Timber Supply Review for four TSAs, including 100 Mile House.

With regard to regional apportionment, Ainsworth recommends a 45/55 split between the Kamloops Region and the Cariboo Region, respectively, based mainly on timber availability shortfalls in the Lillooet TSA.

With regard to apportionment among TSAs, Ainsworth notes that the region and districts in the Cariboo region have not provided "exclusivity" to Ainsworth within PA 16 and allow other licensees to harvest the forest types that Ainsworth is restricted to. The company recommends an allocation of 135,000 cubic metres for the 100 Mile House TSA, which agrees with the ministry's recommendation and represents an increase from the current apportionment of 112,000 cubic metres.

Appendix 1

Submissions received by the 100 Mile House Forest District

Submissions received on the Data Package

Forest industry
100 Mile House TSR Licensees Working Group

Submissions received on the Timber Supply Analysis Report

Forest industry
100 Mile House TSA Major Licensee's Association
Ainsworth Lumber Co.

Interest groups
David Suzuki Foundation